

The FCC should classify Fiber-to-the-Curb (FTTC) the same as Fiber-to-the-Home (FTTH) when determining unbundling requirements. FTTC is the same technology as FTTH, it just serves a few more homes from the customer premise device (the optical network unit, or ONU). More importantly, FTTC is already deployed widely (over a million lines installed) at BellSouth and Sprint and is being massively deployed in all new greenfield applications. FTTC is much more cost effective per home than FTTH. Why was FTTC not even mentioned in the 2/20/03 FCC Order regarding the Review of Section 251?